

REIBMAN & WEINER

26 COURT STREET
SUITE 1005
BROOKLYN, NEW YORK 11242

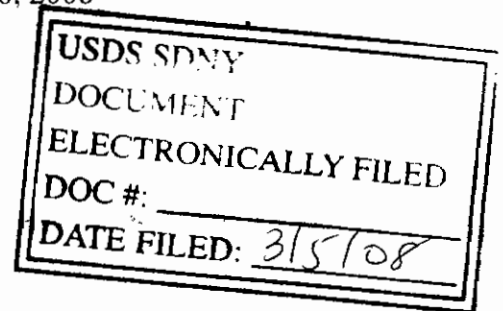
Telephone (718) 522-1743
Facsimile (718) 643-9297

MEMO ENDORSED

February 28, 2008

By Hand

Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



**Re: *Johnson v. City of New York, et. al.,*
07 CV 5805 (RJS)**

Dear Judge Sullivan:

Our firm represents the plaintiff in the above captioned action. I write to request that the current discovery schedule, which includes a deposition deadline of March 3, 2008, and a final discovery deadline of April 18, 2008, be enlarged by 60 days. Counsel for the defendants consents to this request, which is the first made by either party.

Under the proposed schedule, depositions would be completed by May 2, requests to admit served by May 3, and all discovery completed by June 17, 2008. Any pre-motion letters regarding dispositive motions would be due by June 30, with response due July 7, 2008.

Although the parties have exchanged their initial disclosures, as well as discovery demands, the plaintiff was delayed in providing her discovery responses and authorizations for medical and mental health records. As a result, the defendants were unable to proceed with plaintiff's deposition by the original deadline. The additional time requested should permit sufficient time for the defendants to obtain all of the records they are seeking prior the deposition, as well as allowing time for the defendants' and non-party depositions to proceed.

Thank you for your kind attention to this matter.

Request denied. Plaintiff may renew her request by filing a new letter setting forth the reasons for plaintiff's initial "delay" in providing discovery responses, etc.

SO ORDERED
Dated: 3/4/08

RICHARD J. SULLIVAN
U.S.D.J.

Respectfully submitted,
[Signature]

Michael B. Lumer (ML-1947)

cc: Kristen Nolan, Esq. (By facsimile)